



14 April 2023

## **Submission to the *Import risk review for dairy products for human consumption: draft report***

The Australian Dairy Industry Council (ADIC) appreciates the opportunity to provide comment on the *Import risk review for dairy products for human consumption: draft report*.

The ADIC is the peak national representative body of the Australian dairy industry, representing the interests of dairy farmers and processors through its two constituent bodies Australian Dairy Farmers (ADF) and the Australian Dairy Products Federation (ADPF). ADF is the national advocacy body representing dairy farmers across the six dairying states. All state farming organisations are members of ADF. ADPF is the national peak policy and advocacy body representing post farm-gate members of the Australian dairy supply chain, including processors, traders, and marketers of Australian dairy products. ADPF members process more than 90% of Australian milk volumes and provide dairy products for both domestic and export markets.

The ADIC has consulted with Dairy Australia, the national services body for the Australian dairy industry, on the development of this submission.

The ADIC recognises the absolute importance of a detailed and robust biosecurity program. Dairy is the third largest Australian rural industry and a key sector of the agricultural economy, with a farmgate value of \$4.9 billion and a direct workforce of almost 35,000 across dairy farms and processing. Dairy companies also generate approximately A\$15.7 billion in sales. Australia's enviable disease-free status is vital to protecting our industry and allows dairy exporters to access premium markets. As such the review by the Department of Agriculture Fisheries and Forestry (the department) of the protocols which apply to the import of dairy products for human consumption is welcomed.

In response to the draft report, the ADIC has a number of areas it would like to provide comment.

The ADIC commends the department on the thorough process employed in undertaking the review. Of critical importance is the adoption of a science driven policy with respect to biosecurity and the risk-based approach to formulating import conditions for dairy products for human consumption. Adopting a conservative approach to biosecurity risk in defining an "appropriate level of protection" (ALOP) is appropriate given that a zero-risk policy is not realistically achievable.

The process undertaken to identify specific hazards supports the ongoing need for specific requirements for products originating in markets impacted by Foot and Mouth disease (FMD) and/ or Lumpy Skin Disease (LSD). It is noted that with respect to product originating from markets not on the department's FMD free list, dairy products may now be treated by an additional heat treatment protocol of 100°C for 30 minutes. The ADIC recognises that the science validates this process as not presenting any additional risk to Australia's biosecurity, and therefore does not object to its inclusion. However, it is important that this additional permission is not positioned or perceived as a relaxation of Australia's attitude to biosecurity. It is encouraged that any messaging created about this new permission bears this consideration in mind.

There is no objection to removing the need for butter to be treated as an individual case and agrees for it to now be controlled under the "all dairy products" category. Cheese remains an exception and this is well justified.

Studies are currently being undertaken which consider the effectiveness of High Temperature Short Time (HTST) pasteurisation at inactivating LSD virus in milk. It is encouraged that the results of these studies be considered in accordance with the science led approach adopted for the entire review. Amendments to the import conditions for dairy products for human consumption from countries not on the department LSD free list should be reviewed once that research is available.

Reference is made throughout the draft report to "competent authority of the country where manufacture occurred". This prompts the question, competent by whose/ what standards? While it is probably understood, the Australian Government must be responsible for recognising the authority as competent, either through physical inspection or government-to-government agreement. The document would gain greater clarity if this was defined within it. The glossary may be the most appropriate place for this.

Overall, the ADIC supports the draft report with minor adjustments to recognise the points made above. We look forward to working with you on next steps.

Yours sincerely



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